



Sara Bent/R10/USEPA/US

03/31/2008 01:59 PM

To Dan Meyer/R10/USEPA/US@EPA

cc

bcc

Subject Fw: Shell OCS Permit Public Comment

Sincerely,

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Bill MacClarence
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Sent by: billnjan@gci.net

03/27/2008 02:15 PM

To R10-Public Comments@EPA

cc

Subject Shell OCS Permit Public Comment

It appears that EPA is disaggregating the Shell OCS lease in this permit thus allowing concurrent exploratory activities within separate portions of the lease without considering impacts in total. This is not in accordance with the Clean Air Act, which defines "facility" or "stationary source" as "all contiguous or adjacent activities occurring under common control or ownership."

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